

Law Office
JAMES W. DEMPSTER SEC'D TN
REGULATORY AUTH.
118 EAST MAIN STREET
P.O. Box 332
MCMINNVILLE, TENNESSEE 37111-0332
TELEPHONE: (931) 473-4934
FAX: (931) 473-7190
OFFICE OF THE
EXECUTIVE SECRETARY
April 22 1999 4 33 PM

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Waddell:

Re: Petition of Ben Lomand Communications, Inc.
for Approval of An IntraLATA Toll Dialing 258
Parity Implementation Plan, Docket No. 99-00259

Enclosed is an original and 13 copies of a motion of Ben Lomand Communications, Inc. requesting that it be allowed to substitute a new revised intraLATA toll dialing parity implementation plan which is so marked for the intraLATA toll dialing parity implementation plan attached to the Ben Lomand Communications, Inc. petition mailed for filing April 14, 1999, which original plan was designated as Exhibit 1 to the petition of Ben Lomand Communications, Inc. to the Tennessee Regulatory Authority for approval of the subject plan. Or, in the alternative, to revise the original plan filed.

Very truly yours,

James W. Dempster
James W. Dempster

JWD:rml

Enclosures

c: Judy Kelsey, BLC Operations Mgr.
Joe Roper, BLC President
Levoy Knowles, Executive VP, BLC

REC'D TN
REGULATORY AUTH.

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

APR 27 PM 4 33

OFFICE OF THE
EXECUTIVE SECRETARY

IN RE:

PETITION OF BEN LOMAND COMMUNICATIONS,
INC. FOR APPROVAL OF INTRALATA TOLL
DIALING PARITY IMPLEMENTATION PLAN

Docket No. 99-00259 ²⁵⁸

MOTION

Comes Ben Lomand Communications, Inc. (BLC), and does respectfully move the Tennessee Regulatory Authority to supplement the original of the attached revised Ben Lomand Communications, Inc. intraLATA toll dialing parity implementation plan, June 1, 1999, implementation date, revised plan, as Exhibit 1 to its petition which was mailed for filing with the Tennessee Regulatory Authority on April 14, 1999. The basis for this motion to substitute the revised plan for the original plan is for the convenience of the Authority and staff and notification of interexchange carriers of modification of Section IV. Carrier Selection Procedures, by adding a new paragraph following the paragraph entitled New Installation Customers, which new paragraph is entitled Existing Customers.

In the alternative, Ben Lomand Communications, Inc. moves to amend Exhibit 1 to the petition of Ben Lomand Communications, Inc. to the Tennessee Regulatory Authority for approval of the subject plan mailed for filing with the Authority on April 14,

1999, (Docket No. 99-00259) by adding a new subsection to Section IV. Carrier Selection Procedures, immediately in front of Section V. Carrier Notification, and immediately following the subparagraph headed New Installation Customers, in words and figures as follows:

Existing Customers

BLC customers may elect to change their intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers to BLC directly or through their selected carriers.

Customers will be assessed PIC change charges for changing their intraLATA carrier at the intraLATA tariff rate. When customers request a simultaneous change to the same carrier for their interLATA and intraLATA service, BLC will assess one PIC charge from the interLATA tariff and a reduced rate out of the intraLATA tariff. Two full PIC change charges (an interLATA charge and an intraLATA charge) will be assessed if different carriers are chosen.

A charge will be established for unauthorized PIC changes submitted by carriers to BLC for end-user customers (slamming).

RESPECTFULLY SUBMITTED, this 22nd day of April, 1999.

BEN LOMAND COMMUNICATIONS, INC.

By: James W. Dempster
James W. Dempster, Attorney
118 E. Main Street
P.O. Box 332
McMinnville, TN 37111-0332
Phone: (931) 473-4934
Fax: (931) 473-7190

BEN LOMAND COMMUNICATIONS, INC.

IntraLATA Toll Dialing Parity Implementation Plan

June 1, 1999

Implementation Date

Revised Plan

BEN LOMAND COMMUNICATIONS, INC.

McMinnville, Tennessee

April 13, 1999

**Exhibit 1 to the Petition of BEN LOMAND COMMUNICATIONS, INC. to the
Tennessee Regulatory Authority for Approval of the subject plan.**

I. Purpose

Ben Lomand Communications, Inc. (BLC) has described herein the process for implementing intraLATA toll dialing parity in the BLC exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

II. IntraLATA Environment

BLC currently has no customers. At the time customers receive service, they will be able to subscribe to the carrier of their choice for intraLATA as well as interLATA service (two-PIC subscription capability.) Customers will dial 1+ the area code and number to complete calls using their subscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code.

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA toll calls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carrier's via an order from the Tennessee Public Service Commission. BellSouth currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by BLC intraLATA toll customers and to ensure that billing does not occur on these calls. BLC will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing as long as technically feasible.

III. Implementation Schedule

BLC will provide intraLATA toll dialing parity in Tennessee at the time customer service is available.

IV. Carrier Selection Procedures

BLC will implement the full Two-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full two-PIC methodology, customers will be able to subscribe to one telecommunications carrier for interLATA toll calls and subscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls.

BLC employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain to customers the process for making PIC changes for intraLATA toll calls. Business Office personnel and the Customer Account Records system will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

New Installation Customers

BLC customer contact representatives will be provided discussion guidelines that will provide a new customer with the following information:

1. Inform the customer that a choice of intraLATA toll providers is now available to him or her.
2. Offer to read the customer a list of available carriers in randomly generated order.
3. Advise the customer that various carriers provide intraLATA toll service.

Customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

Existing Customers

BLC customers may elect to change their intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers to BLC directly or through their selected carriers.

Customers will be assessed PIC change charges for changing their intraLATA carrier at the intraLATA tariff rate. When customers request a simultaneous change to the same carrier for their interLATA and intraLATA service, BLC will assess one PIC charge from the interLATA tariff and a reduced rate out of the intraLATA tariff. Two full PIC change charges (an interLATA charge and an intraLATA charge) will be assessed if different carriers are chosen.

A charge will be established for unauthorized PIC changes submitted by carriers to BLC for end-user customers (slamming).

V. Carrier Notification

Interexchange carriers will be notified of BLC intraLATA toll dialing parity implementation via Certified U. S. Mail at the same time they are notified of the C-LEC operation and the need to order trunking facilities. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying BLC.

BLC will offer BLC Listed Name and Address and BLC Change Activity Register services for the purpose of assisting the carrier's marketing efforts in connection with marketing their telecommunications services. BLC Listed Name and Address service provides a list of customers available for subscription within BLC central offices. The data base is updated monthly.

VI. Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard exist for access to Operator Services and Directory Assistance unique to intraLATA services. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

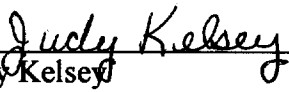
VII. Cost Recovery

BLC does not request any cost recovery since intralata dialing parity will be implemented with the offering of service.

VIII. Statement of Compliance

BLC will comply with all rules of the FCC and the TRA.

Executed as of the 13th Day of April, 1999



Judy Kelsey
Operations Manager

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing motion on behalf of Ben Lomand Communications, Inc. via United States Mail, first class postage prepaid, and properly addressed to the following:

AT&T Communications

**Gary Andraza, Assistant Vice President
Government Affairs**
511 Union Street, Suite 700
Nashville, TN 37219
(615) 242-2815

BellSouth Telecommunciations, Inc.

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300
(615) 214-6301

Citizens Communications

J. Michael Swatts
State Regulatory Director-South
300 Bland Street
P.O. Box 770
Bluefield, WV 24701
(304) 325-1216

Frontier Communications Services

Scott Nichols, Senior Manager
Regulatory Affairs
1990 M. Street, N.W. Suite 500
Washington, D.C. 20036
(202) 293-0593

ICG Telecom Services, Inc.

Michael McCaw
315 Deaderick Street, Suite 2150
Nashville, TN 37238
(615) 251-4440

MCI Telecommunications Corporation

Kathy Pounds, Director
Law and Public Policy
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342
(404) 250-5500

Sprint Communications Company, L.P.

Tony Key, Director

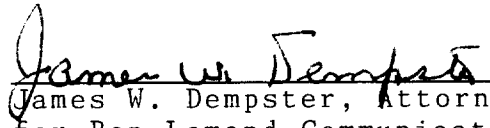
State Regulatory

3100 Cumberland Circle

Atlanta, GA 30339

(404) 649-5144

This 22nd day of April, 1999.


James W. Dempster, Attorney
for Ben Lomand Communications,
Inc.